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**UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION**

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

**PETITION BY THE UNITED STATES
DEPARTMENT OF TRANSPORTATION
FOR ASSIGNMENT OF AN ABBREVIATED
DIALING CODE (N11) TO ACCESS
INTELLIGENT TRANSPORTATION SYSTEM
(ITS) SERVICES NATIONWIDE**

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FILE NO. NSD-L-99-24

CC DOCKET NO. 92-105

INITIAL COMMENTS OF THE 211 COLLABORATIVE

Pursuant to the April 20, 1999, notice of the Federal Communications Commission (Commission), the 211 Collaborative hereby files these Initial Comments with respect to the "Petition by the United States Department of Transportation (DOT) for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide." In support hereof, the 211 Collaborative states as follows:

I. Summary of Comments.

The 211 Collaborative does not oppose DOT's petition, provided that the Commission assigns a number other than 211 to ITS services.¹ In this regard, at present, two N11 dialing codes remain unassigned: 211 and 511. In its Petition, DOT does not request assignment of a particular dialing code and, thus, would apparently be satisfied if the Commission assigned 511 for accessing ITS services. The 211 Collaborative would not oppose the Commission's assignment of 511 for accessing ITS services. However, the 211 Collaborative would strongly oppose assignment of 211 for access to ITS services on a nationwide basis.

The 211 Collaborative currently has pending before the Commission a request that the Commission assign the 211 dialing code for use by the public nationwide to access services

¹ It is the 211 Collaborative's understanding that, officially, four N11 numbers have not been assigned, i.e., 211, 511, 611, and 811. However, the 211 Collaborative also

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providing free information and referral regarding community service and support organizations. The 211 dialing code currently is in use for accessing community resource information and referral ("community I&R") services in several locales. Several requests already have been filed with state regulatory authorities for assignment of 211 for access to community I&R. Significant time, effort and resources have already been devoted to developing and implementing the 211 dialing code for access to community I&R services.

Given the longstanding request by the 211 Collaborative for assignment of 211 nationwide, and the DOT's willingness to accept any available N11 number for ITS services, the Commission should not act on DOT's petition in a manner which would undermine the current use of 211 by community resource I&R, nor should the DOT petition provide any basis for delaying Commission action on the 211 Collaborative's pending request for assignment of a dialing code, which has been pending before the Commission for over a year.

I. Members And Interest Of The 211 Collaborative.

The 211Collaborative is a group of 13 non-profit organizations, which share the common mission of connecting people to valuable human services available in their communities. All of the Collaborative member organizations abide by the national standards for information and referral services that have been developed by United Way and AIRS based on their decades of experience in this field. Current members of the 211 Collaborative are:

Alliance of Information and Referral Systems (AIRS)
 United Way of America
 United Way of Connecticut
 United Way 211 (Atlanta, GA)
 Florida Alliance of Information and Referral Services

understands that the latter two numbers are currently used by certain LECs internally for such activities as payphone repair service.

Illinois Alliance of Information and Referral Systems
 Infoline of Los Angeles
 Massachusetts Alliance Of Information and Referral Systems
 Nebraska 211 Coalition
 Ohio Council of Information and Referral Providers
 Information and Referral Providers of Wisconsin
 Texas Information and Referral Network
 Community Information Toronto

These organizations also share a common vision of establishing an easy to use and easy to remember three digit dialing code that persons in need across the country can use to obtain information quickly and at no charge about the availability of community resources to address their situations. Each member of the 211 Collaborative is pursuing assignment and implementation of 211 as the dialing code for this purpose at the local level, as well as pursuing assignment of this dialing code from this Commission. Two members already have successfully implemented 211 as a dialing code for this purpose. Other members are in varying stages of implementation, as described more fully below.²

II. The 211 Collaborative's Petition.

On May 28, 1998, the 211 Collaborative (which, at the time, consisted of 6 members³) filed a request with the Commission seeking assignment of 211 for use by community I&R services. The 211 Collaborative explained in its request that assignment of one of remaining

² Since it originally was established in 1997, the 211 Collaborative has grown from its original 6 members to 13 member organizations. And, as explained below, there is a groundswell of support beyond the 211 Collaborative's official membership for assignment of 211 for community resource I&R. At present, efforts are underway to promote use of 211 for this purpose by private organizations as well as state government officials in at least 20 states, as well as in Canada.

³ The original members of the 211 Collaborative were AIRS, United Way of America, United Way 211 (Atlanta), United Way of Connecticut, Florida AIRS, and the Texas I&R Network.

N11 codes for this non-commercial purpose was to the highest and best possible use, consistent with the standards set forth in the Commission's February 19, 1997 First Report and Order in CC Docket No. 92-105.⁴ The 211 Collaborative noted that there are several types of urgent and critical human needs that are not properly addressed by calls to 911 and 311. These situations may involve a need for immediate shelter, assistance with food, help with a non-life threatening, but still serious, medical condition, assistance with rent or mortgage issues (i.e., threat of eviction), support on utility questions, need for counseling/shelter arising from ongoing physical and/or sexual abuse; and counseling for potential suicide. Less urgent, but no less important are situations that involve issues such as a need for aging or hospice services, legal assistance, substance abuse counseling, child care solutions, and youth activities.

The 211 Collaborative observed that resources typically exist in every community to address needs such as those identified above and that, in many communities, non-profit I&R service providers serve as a vital link to put persons in need together with the community resources that can help them. These community I&R services provide a critical safety net to individuals and families in crisis and those struggling with ongoing problems. However, the 211 Collaborative noted, there currently is no uniform point of reference nationwide that persons know they can turn to in order to obtain information vital to addressing significant human needs. The 211 dialing code has been used successfully for this point of contact in several locations. Accordingly, the 211 Collaborative requested the Commission to assign 211 on a nationwide basis so that persons in need across the country, wherever they are, have a single, easy to

⁴ In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, 12 FCC Rcd. 5572 (Feb. 19, 1997) ("First Report and Order").

remember dialing code that will enable them to access the community resources available to address their needs.

The 211 Collaborative's Request for Assignment received resounding support from a broad array of commenters. Of the more than 150 comments filed, the overwhelming majority expressed strong support for the requested assignment. Support for the request came from community service agencies, federal, state and local government officials, phone companies ("LECs") and individuals.⁵

The comment cycle for the 211 Collaborative's request for assignment closed on October 5, 1998. The 211 Collaborative's request is pending action by the Commission.

II. The Commission Should Not Assign 211 For Access To ITS Services.

The Collaborative does not object to DOT's request for assignment of an N11 number for ITS services, provided that a number other than 211 is assigned for access to ITS services. Members of the 211 Collaborative and other community service organizations have invested significant time and resources, both human and financial, to promoting and developing 211 as the gateway to Community I&R services. Assigning 211 to ITS services, particularly when DOT's petition does not request that number, would undermine several functioning 211 centers and would render worthless the efforts that have been devoted to promoting the dialing code 211 for Community I&R services.

⁵ The handful of opponents consisted of existing 911 and 311 service providers who appear generally to oppose the notion of assignment of another N11 number for any purpose, an incumbent user of 211 for access to a dating service, one LEC, and an association of independent payphone operators concerned primarily with the LECs' practice of excluding independently owned payphone repair service from use of 611.

At present, there are functioning 211 community I&R call centers in Georgia and Connecticut. On May 6, 1997, the Georgia Public Service Commission assigned the 211 dialing code for use by United Way 211 in providing free access to community I&R in the 13 counties in and around Atlanta. United Way 211 call center in Atlanta provides 24 hour a day, seven days a week information and referral services to persons in need, using a data base of over 2,000 resources to match callers to human and social services.⁶ Approximately \$1.6 million was invested to develop and implement the 211 call centers in the Atlanta metropolitan area. United Way 211's current annual operating budget exceeds \$2 million.

For many years, United Way of Connecticut, in conjunction with the State of Connecticut, operated an 800 number, Infoline, through which individuals could obtain information regarding community resources. On January 1, 1999, as a result of strong support from Governor John Rowland and the state legislature, Infoline converted its 10-digit dialing code to the more user-friendly, easy to remember 211 code. This dialing code may be used by persons in need to make a free call anywhere in the state, 7 days a week, 24-hours a day to obtain information about available community resources to provide assistance.⁷ The services and information available via 211 in Connecticut encompass 60 different agencies, including both

⁶ The United Way 211 data base includes a complete array of public and private agencies and programs in its region, not just United Way member agencies or those supported by United Way funding. Accordingly, comprehensive information on all community resources is available through United Way 211.

⁷ United Way of Connecticut's experience since January 1, 1999 confirms that use of an N11 dialing code, as opposed to the cumbersome 10-digit codes, dramatically increases the number of calls to community I&R services and, concomitantly enhances the likelihood that persons in need will be able to identify and get in contact with community service organizations that can meet those needs. In this regard, since United Way of Connecticut switched from a 10 digit dialing code to 211, the number of calls received at its call centers jumped by 47 percent.

state and private organizations, which provide services ranging from crisis intervention (including suicide) counseling, child care information and referral service, to Medicaid managed care and service. The 211 call centers in Connecticut are supported by state, federal and private funding. The State of Connecticut has made a significant financial commitment to the 211 dialing code. In this regard, to initiate use of 211, the State invested \$920,000 in computer equipment upgrades, added \$1.3 million to the existing budget for Infoline's call centers,⁸ and spent \$250,000 to market the 211 dialing code within the state.

Although at this moment in time, Atlanta and Connecticut are the only community I&R services using the abbreviated 211 dialing code, there has been widespread support and interest expressed by other organizations in using 211 to enhance their ability to effectively place persons in need together with the community resources available to meet those needs. Personnel of United Way 211 and other members of the Collaborative receive calls and correspondence on a daily basis from organizations seeking information regarding development and implementation of 211 call centers. Persons directly involved in implementing Atlanta's United Way 211 have met with community service organizations, local governments, and I&R providers across the country to discuss Atlanta's United Way 211 experience and to provide guidance regarding the mechanics of establishing and operating similar community I&R services. In response to this groundswell of interest in 211 for community resource I&R, the members of the 211

⁸ In recent years, Infoline's budget for operating call centers using the 10-digit dialing code ranged from \$4-5 million, with those funds coming overwhelmingly from state and federal sources.

Collaborative have invested significant time and resources in developing written materials that provide detailed, step-by-step instructions for others on how to implement 211 call centers.⁹

In this regard, AIRS and its local affiliates have worked diligently to respond to the interest expressed by organizations and communities in developing community I&R services that can be readily accessed by dialing 211. AIRS is a non-profit organization supporting 990 member agencies, including 974 member I&R providers, 24 state and regional affiliate organizations, several military representatives of each branch of the armed forces, and Area associations of Aging and Associated Disabilities. The 211 dialing code was a topic of considerable interest and activity at AIRS' annual conference in May of this year. That conference was attended by nearly 600 representatives from I&R service providers nationwide. Numerous workshops were held regarding use of 211 for access to community I&R services and all were well-attended.

The substantial commitment of time and resources to educate I&R service providers on how to establish 211 call centers, and how that abbreviated dialing code can dramatically enhance the ability of human service organizations to effectively deliver their services to as broad a population as possible, is about to bear fruit across the country.

In Massachusetts and Wisconsin, for example, petitions already have been filed with the state regulatory authorities seeking assignment of 211 at the state level as the dialing code to access community resource I&R services. Based on the success of United Way 211 in Atlanta,

⁹ Although the 211 Collaborative does not have the details of the petition at this time, it is their understanding that the Alabama Public Service Commission also has received a request that it assign 211 for use by community resource I&R providers.

other communities in Georgia are following United Way 211's lead. In this regard, the Georgia PSC has been requested to make 211 effective in Columbus and surrounding counties.

Just last week, Mayor Anthony Williams held a press conference to announce that the District of Columbia was inaugurating a community I&R service that would rely on a dialing code that incorporates the 211 sequence.¹⁰ Upon Commission approval of the 211 Collaborative's request for assignment, the District's chosen code can be readily transformed into the 211 abbreviated code, and can capitalize on the number recognition that was developed by incorporating 211 into the 10 digit code in the first place. It is the 211 Collaborative's understanding that many other community resource I&R providers are merely awaiting Commission approval of 211 for this use before they, too, seek authorization at the state level to implement local use of 211 to serve community human needs.

In addition to those persons who already have filed petitions with their public utility commissions, 211 Collaborative members and other organizations are well-along in the process of finalizing petitions that will be filed with their respective state regulatory authorities for assignment of 211 for community resource I&R petition. In most of these cases, the prospective petitioners have been working closely with their state regulators to develop a program for implementing 211 for community resource I&R providers. Members of the Collaborative that are at this stage of implementing 211 for community resource I&R are the Texas I&R Network

¹⁰ See "A Wrong Number No Longer," Washington Post, July 13, 1999, page B3 ("The Answers Please call center, 202-463-6211 (INFO-211), has a staff of 13 who refer people to government or private-sector agencies -- from a database of 1,000 social-service providers -- that can answer their needs. Through a contract with AT&T, the attendants can get translation services immediately in 110 languages. Previously, Human Services had two people who relied on handwritten notes and an outdated referral book.").

and the Nebraska 211 Coalition.¹¹ In addition, organizations in the states of North Carolina, Virginia, Pennsylvania, Idaho, and Utah -- while not formal members of the 211 Collaborative -- are well-advanced in their efforts to establish 211 as the state and/or local dialing code to access community I&R services.¹²

Other community human service organizations and I&R providers are at the more preliminary stage of mobilizing support for establishing 211 as the dialing code for community resource I&R services. Efforts currently are being organized to pursue 211 as the point of access for information about community resources are underway by members of the 211 Collaborative in Ohio, Florida, Illinois, Los Angeles and, by other organizations in Minnesota, Michigan, and New York.

Support for using 211 to access community resource I&R services also has spread to Canada. Acting on behalf of Information Canada and the United Way of Canada, Community Information Toronto (CIT) and the United Way of Greater Toronto (UWGT) have applied to the Canadian Steering Committee on Numbering (CSCN) for the assignment of 211 for access to human service information. The Canadian Radio-Television and Telecommunications Commission (CRTC) has decided that they will hear the submission directly along with a Public Notice on the assignment of abbreviated dialing codes. In the interim, CIT is evolving the CIT database into the Toronto Human Service Information System (THIS); a web-enabled database

¹¹ The Texas I&R Network has publicly announced its intention to seek assignment of 211 from the Texas regulatory authorities and anticipates filing a formal request for assignment in the near future.

¹² In North Carolina, for example, the Governor has expressed to the Utilities Commission his strong support for exclusive reservation of 211 on a statewide basis for use as an information and referral number, consistent with the 211 Collaborative's efforts to obtain

that will fully support the requirements of 211. Funding is being provided by all three levels of the Canadian government, federal, provincial and municipal, along with United Way and community support.

III. The Commission's Consideration Of DOT's Petition Should Not Delay Or Compromise Action On The 211 Collaborative's Petition.

The Commission should not view the DOT's request for an N11 number as creating a need to embark on a general inquiry as to how the remaining two N11 numbers should be assigned. The 211 Collaborative respectfully submits that such action is unnecessary and would unfairly delay action on the Collaborative's longstanding request for assignment.

In its "First Report and Order," the Commission considered and rejected a request for assignment of an N11 dialing code and, furthermore, put potential requesting parties on notice of the standard the Commission would apply when considering requests for N11 assignment in the future. In the two and a half years since its First Report and Order issued, to the knowledge of the 211 Collaborative, the Commission has received only two requests for assignment of an N11 dialing code, one from the Collaborative itself and the other from DOT. Each time, the Commission issued a public notice. Persons and organizations desiring to obtain assignment of the remaining N11 numbers have had ample time, opportunity and notice to do so. Indeed, if such persons or organizations existed, the rational response to the Collaborative's request would have been to notify the Commission of the organization's interest in a nationwide N11 number. But, no such placeholder comments were filed in response to the Collaborative's request.

assignment from this Commission. Letter of Hon. James B. Hunt to Jo Anne Sanford, Chair, North Carolina Utilities Commission (June 23, 1999).

In addition, the Commission's First Report and Order, the North American Numbering Council (NANC) has met regularly to consider numbering questions, including use and assignment of N11 dialing codes. These meetings afforded yet another opportunity for persons desiring assignment of N11 to realize that those numbers have dwindled to two and that delay in seeking assignment of an N11 for their desired purpose was not advisable.¹³

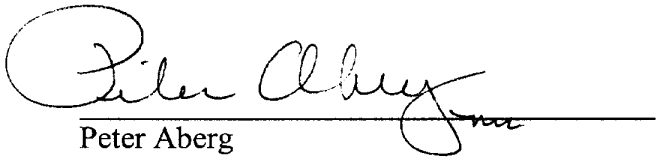
The 211 Collaborative respectfully submits that there is no need to delay action on its request (or on the DOT Petition for that matter). Rather than holding in limbo the question of how the two remaining N11 codes should be assigned, the Commission should act on the two petitions it currently has before it, assigning 211 for use by Community I&R providers and 511 for use by ITS services. This course would resolve the longstanding uncertainty surrounding the remaining N11 codes. And Commission assignment as requested by the Collaborative would achieve an assignment that is unquestionably the highest and best use of this scarce national resource, by reserving 211 for use by organizations whose mission is safeguarding and improving the quality of human life.

Nor, as a procedural matter, is there any reason or basis for the Commission to suspend or delay action on the Collaborative's request for assignment while the Commission considers DOT's Petition. The 211 Collaborative's request and the DOT petition are not incompatible, as DOT itself has observed. Given DOT's willingness to accept any N11 number for ITS service, including 511, there is no need to delay action on the Collaborative's request. If the Commission

¹³ The NANC Working Group is significant to both the DOT and the 211 Collaborative's requests for assignment in another respect as well. In the Working Group's report on numbering issues, it observed that N11 codes "are not a viable option for . . . abbreviated dialing as identified by the Commission" in FCC97-51. Report and Recommendations of the Abbreviated Ad Hoc Working Group to NANC ¶7.

agrees with the Collaborative that 211 is best reserved for use by community I&R services, there will remain an N11 number that is entirely acceptable to DOT, if the Commission finds DOT has warranted assignment of an N11 number.

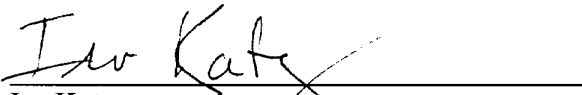
Respectfully submitted,



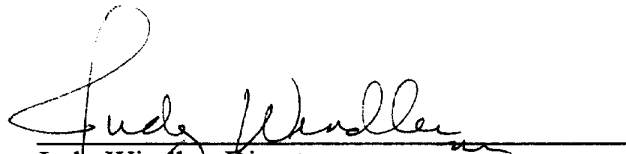
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